

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

EUGENE O'MALLEY	:	JURY TRIAL DEMANDED
Plaintiff	:	
	:	
vs.	:	
	:	CASE NO.: 3:17-cv-01419-RDM
DOWD MARKETING, INC.	:	
Defendant	:	

MOTION FOR EXTENSION OF REINSTATEMENT PERIOD

Plaintiff Eugene O'Malley hereby moves for an extension of the 30-day reinstatement period, and in support thereof states:

1. The parties negotiated settlement of this case on November 23, 2020.
2. On November 23, 2020, this Honorable Court entered an Order dismissing the case and permitting reinstatement within sixty (60) days if settlement was not consummated. (Doc. 68).
3. The 60 day period for reinstatement will run on January 22, 2021.
4. Counsel have worked diligently and have negotiated a settlement agreement, but need additional time to complete the process and consummate settlement.
5. Plaintiff respectfully requests that this Honorable Court issue an Order extending the reinstatement period by an additional third (30) days.

6. Defendant concurs in this motion.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court issue an Order extending the reinstatement period for an additional 30 days, permitting reinstatement on or before February 22, 2021 if settlement is not consummated.

Date: 1/19/2021

Respectfully submitted,

/s/ George R. Barron  
Counsel for Plaintiff  
88 North Franklin Street  
Wilkes-Barre, PA 18701